

JAP:DKK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ALLISON ROCKCLIFFE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL WOESSNER, being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

On or about April 23, 2016, within the Eastern District of New York and elsewhere, the defendant ALLISON ROCKCLIFFE did knowingly, intentionally and unlawfully attempt to import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960 and 963).

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about April 23, 2016, the defendant ALLISON ROCKCLIFFE arrived at an airport in St. Lucia and checked in to Jet Blue Flight No. 882 from St. Lucia to

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

**16M 387**

COMPLAINT

(21 U.S.C. §§ 952(a), 960 and 963)

JFK International Airport in Queens, New York. The defendant checked two suitcases for that flight, a black suitcase and a red and black suitcase.

2. On or about April 23, 2016, agents from the DEA searched the black suitcase associated with the defendant ALLISON ROCKCLIFFE, which suitcase was found to contain a white powdery substance that field-tested positive for cocaine. The agents put the black suitcase containing the cocaine back on Jet Blue Flight No. 882.

3. On or about April 23, 2016, the defendant ALLISON ROCKCLIFFE arrived at JFK airport on Jet Blue Flight No. 882. Agents from the United States Customs and Border Patrol (“CBP”) retrieved the two suitcases associated with the defendant’s ticket and stopped the defendant in the airport.

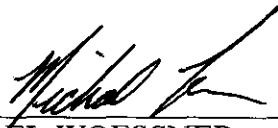
4. On or about April 23, 2016, CBP agents showed the defendant ALLISON ROCKCLIFFE that her black suitcase contained cocaine. The defendant stated, in sum and substance, that she had only one bag, the one without the cocaine.

5. On or about April 23, 2016, agents from the United States Department of Homeland Security, Homeland Security Investigation (“HSI”) then interviewed the defendant ALLISON ROCKCLIFFE. Before the interview, HSI agents advised the defendant of her Miranda rights, which rights she agreed to waive. After waiving her rights, the defendant stated, in sum and substance, that she had been carrying both suitcases—including the one with cocaine—that she knew the black suitcase contained narcotics, and that she was going to be paid \$3000 to bring the suitcase to the United States.

6. The total gross weight of the cocaine in the defendant ALLISON ROCKCLIFFE’s black suitcase was approximately 7.4 kilograms.

WHEREFORE, your deponent respectfully requests that the defendant  
ALLISON ROCKCLIFFE be dealt with according to law.

Dated: Brooklyn, New York  
April 25, 2016

  
\_\_\_\_\_  
MICHAEL WOESSNER  
Task Force Officer  
Drug Enforcement Administration

Sworn to before me this  
25th day of April, 2016

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THE HONORABLE VERA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK